

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff

v.

Civil Action No.: 05CV40119-FDS

SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION,

Defendants

**ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO FILE PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

NOW COME the Plaintiff, Wendy Gauthier, in the instant case, and respectfully requests that this Court allow her Assented-To Motion For Enlargement Of Time To File Plaintiff's Opposition To Defendants' Motion For Summary Judgment, from April 16, 2007 to April 30, 2007 for the following reasons:

1. At the Status Conference on December 11, 2006, the Court established that the Scheduling Order deadlines would be modified so that dispositive motions due by were due by March 2, 2007 and responses to the same were due by March 30, 2007.
2. On or about February 23, 2007, the Defendants submitted the Defendants' Motion to Extend the Deadlines in the Pretrial Scheduling Order by Thirty Days. This Motion, which was allowed by the Court on or about February 27, 2007, effectively established April 2, 2007 as the new deadline for filing dispositive motions.
3. While the Order indicated that the Court had allowed the Defendants' Motion to Extend the Deadlines in the Pretrial Scheduling Order by Thirty Days as it pertained to the filing of the

dispositive motion, the Order made no specific reference as to whether the Plaintiff's time for serving an opposition to such dispositive motion was extended accordingly.

4. The Defendants' Motion for Summary Judgment and associated documents were filed with the Court on April 2, 2007. The Defendants' Motion for Summary Judgment raises several factual and legal issues to which the Plaintiff must respond. Given the numerous issues involved, the Plaintiff appropriately requests an enlargement of time within which to respond to the Defendants' Motion for Summary Judgment.

5. Additionally, Counsel for the Plaintiff has various scheduling conflicts that will make it very difficult for the Plaintiff to file her Opposition To Defendants' Motion for Summary Judgment on April 16, 2007.

6. Counsel for the Defendant has expressed his assent to this Motion, and the allowance of this Motion will not affect the date set by the Court for the hearing on the Defendant's Motion for Summary Judgment.

WHEREFORE, the Plaintiff respectfully request that this Court grant the within Motion to extend the time for the Plaintiff to file her summary judgment opposition to April 30, 2007.

Respectfully submitted:

The Plaintiff
WENDY GAUTHIER

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Assented-To:

The Defendant
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Dated: April 11, 2007